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UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

ABDERRAHIM ASSEMAHLI,

Petitioner,

vs.

CHRISTOPHER J. LAROSE, Senior Warden, Otay Mesa Detention Center; PATRICK DIVVER, Field Office Director, San Diego Office of Detention and Removal, U.S. Immigration and Customs Enforcement; DAVID J. VENTURELLA, Acting Director, U.S. Immigration and Customs Enforcement; MARKWAYNE MULLIN, Secretary, U.S. Department of Homeland Security; and TODD BLANCHE, U.S. Attorney General,

Respondents.

Case No.: '26CV4330 JO AHG

PETITION FOR WRIT OF HABEAS CORPUS AND ORDER TO SHOW CAUSE WITHIN THREE DAYS; COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF

Challenge to Unlawful Incarceration; Request for Declaratory and Injunctive Relief

INTRODUCTION

1. Petitioner Abderrahim Assemahli ("Petitioner" or "Mr. Assemahli") is detained at Otay Mesa Detention Center in San Diego, California.

2. Petitioner is alleged to have been born in Morocco. He has a pending application for adjustment of status through his U.S. citizen wife.

3. On information and belief, he entered the U.S. lawfully and may have overstayed his entry visa.

4. On information and belief, Petitioner was traveling with his wife to Phoenix, Arizona, to visit his mother-in-law and was detained at an airport without notice.

5. On information and belief, petitioner is sick and U.S. Immigration and Customs Enforcement ("ICE") has not provided him with all of the medications that he needs.

6. Petitioner's ongoing detention also violates his Fifth Amendment substantive due process right under the U.S. Constitution because he is neither a flight risk nor a danger to the community. *Zadvydas v. Davis*, 533 U.S. 678, 693 (2001). In addition, his re-detention violates his procedural due process rights because he was re-detained by Respondents without any notice or any opportunity to contest his detention before a neutral arbiter.

7. Accordingly, Petitioner seeks a writ of habeas corpus requiring that he be immediately released from custody and to enjoin Respondents from re-detaining

him: (1) absent further order of this Court; or (2) absent the provision of a constitutionally adequate pre-deprivation hearing before this Court, at which Respondents will bear the burden of proving by clear and convincing evidence that he is a flight risk or a danger to the community.

JURISDICTION

8. This action arises under the Constitution of the United States and the Immigration and Nationality Act ("INA"), 8 U.S.C. § 1101, *et seq.*

9. This Court has subject matter jurisdiction under 28 U.S.C. § 2241 (habeas corpus), 28 U.S.C. § 1331 (federal question jurisdiction), art. I, § 9, cl. 2 of the United States Constitution (Suspension Clause), and 28 U.S.C. § 1346 (U.S. as defendant), and 28 U.S.C. § 1651 (All Writs Act).

10. Federal district courts have jurisdiction to hear habeas claims brought by noncitizens challenging the lawfulness of their detention. *See Demore v. Kim*, 538 U.S. 510, 516-17 (2003) (recognizing habeas jurisdiction over immigration detention challenges); *Zadvydas v. Davis*, 533 U.S. 678, 687 (2001) (same).

11. This Court may grant relief under the habeas corpus statutes, 28 U.S.C. § 2241, *et seq.*, the Declaratory Judgment Act, 28 U.S.C. § 2201, *et seq.*, the All Writs Act, 28 U.S.C. § 1651, and the Court's inherent equitable powers.

VENUE

12. Venue is proper because Petitioner is in Respondents' legal and physical custody at Otay Mesa Detention Center in San Diego, California. Venue is

further proper because a substantial part of the events or omissions giving rise to Petitioner's claims occurred in this District, where Petitioner is now in Respondents' legal and physical custody, including Petitioner's current and ongoing detention under the legal and physical custody of Respondent LaRose, warden of Otay Mesa Detention Center. 28 U.S.C. § 1391(e); *Rumsfeld v. Padilla*, 542 U.S. 426, 443 (2004) (habeas petition must be addressed to the federal district court of confinement); *Wairimu v. Dir., Dep't of Homeland Sec.*, No. 19-CV-174-BTM-MDD, 2019 WL 460561, at *2 (S.D. Cal. Feb. 5, 2019) (district of confinement is the preferable forum even if the Court otherwise has personal jurisdiction).

CUSTODY AND REQUIREMENTS OF 28 U.S.C. §§ 2241, 2243

13. The Court must grant the petition for writ of habeas corpus or issue an order to show cause ("OSC") to the Respondents "forthwith," unless Petitioner is not entitled to relief. 28 U.S.C. § 2243. If an OSC is issued, the Court must require Respondents to file a return "within three days unless for good cause additional time, not exceeding twenty days, is allowed." *Id.*

14. Courts have long recognized the significance of the habeas statute in protecting individuals from unlawful detention. The Great Writ has been referred to as "perhaps the most important writ known to the constitutional law of England, affording as it does a swift and imperative remedy in all cases of illegal restraint or confinement." *Fay v. Noia*, 372 U.S. 391, 400 (1963).

15. Petitioner is "in custody" for the purpose of 28 U.S.C. section 2241 because he was arrested by Respondents and remains in their legal and physical custody at Otay Mesa Detention Center in San Diego, California. He is under Respondents' and their agents' direct control.

PARTIES

16. Petitioner is alleged to have been born in Morocco. He has a pending application for adjustment of status through his U.S. citizen wife. He is currently residing in Respondents' custody at Otay Mesa Detention Center in San Diego, California, as of the time of the filing of this petition.

17. Respondent Christopher LaRose ("LaRose") is the Senior Warden at Otay Mesa Detention Center in San Diego, California, where Petitioner is detained. LaRose is responsible for the day-to-day operations and confinement of non-citizens detained at that facility. LaRose is a custodian of Petitioner. He is sued in his official capacity.

18. Respondent Patrick Divver ("Divver") is the Field Office Director of ICE in San Diego, California. ICE is responsible for local custody decisions relating to non-citizens charged with being removable from the U.S., including the arrest, detention, custody status, and removal of non-citizens. The San Diego Field Office's area of responsibility includes San Diego and Imperial Counties in California. Respondent Divver is a custodian of Petitioner. He is sued in his official capacity.

19. David J. Venturella is the Acting Director of ICE, a federal law enforcement agency within DHS. ICE's responsibilities include operating the immigration detention system. In his capacity as ICE Acting Director, he exercises control over and is a custodian of persons held at ICE facilities nationally. He is Petitioner's immediate custodian and is responsible for Petitioner's detention. He is sued in his official capacity.

20. Respondent Markwayne Mullin ("Mullin") is the Secretary of DHS. He is responsible for the implementation and enforcement of the INA and oversees ICE, which is responsible for Petitioner's detention. Mr. Mullin has ultimate custodial authority over Petitioner. He is sued in his official capacity.

21. Respondent Todd Blanche ("Blanche") is the Attorney General of the United States. He is responsible for the Department of Justice, of which the Executive Office for Immigration Review—and the Board of Immigration Appeals and immigration court system it operates—is a component agency. He is sued in his official capacity.

FACTUAL BACKGROUND

22. Petitioner is alleged to have been born in Morocco.

23. On information and belief, he entered the U.S. lawfully and may have overstayed his entry visa.

24. On or about June 16, 2025, U.S. Citizenship and Immigration Services ("USCIS") issued a Notice of Receipt of the Form I-130, Petition for Noncitizen

relative filed on behalf of Petitioner as a beneficiary. **Exhibit A-2**, Form I-130 Receipt Notice. On information and belief, he currently has a pending application for adjustment of status through his U.S. citizen wife. *See id.*

25. On or about July 5, 2026, Petitioner's wife learned of a family emergency and made plans to travel to Phoenix, Arizona, to see Petitioner's mother-in-law. **Exhibit A-4**, Letter of Support by M.C.S., at 1.

26. On or about July 15, 2026, Petitioner's wife and Petitioner had flights reserved to travel to Arizona to support Petitioner's mother-in-law after the passing of the family dog. *Id.* at 1-2. While at the airport that day, two individuals approached Petitioner and his wife. The individuals, who appeared to be a regular couple, identified themselves as being with ICE, asked for Petitioner's full name, and inquired about Petitioner's expired visa. *Id.* at 2. Petitioner and his wife provided "more than 300 pages of more supportive documents we had submitted back in January 2026" regarding Petitioner's immigration status and adjustment of status application through his U.S. citizen wife. *See id.*

27. On information and belief, petitioner is sick and ICE has not provided him with all of the medications that he needs. **Exhibit A-3**, Petitioner's Medical Records (identifying medical concerns); **Exhibit A-4**, Letter of Support by M.C.S., at 2 ("...the clinic was only giving him his diabetes medication, and nothing else.").

28. Petitioner's wife is in severe emotional and financial distress over Petitioner's detention at the airport without notice or an opportunity to be heard,

especially while, on information and belief, Petitioner has a currently pending application for relief before USCIS. **Exhibit A-4**, Letter of Support by M.C.S., at 2.

29. Petitioner is currently residing in Respondents' custody at Otay Mesa Detention Center in San Diego, California, as of the time of the filing of this petition. **Exhibit A-1**, ICE Detainee Locator.

LEGAL FRAMEWORK

30. Noncitizens seeking asylum are guaranteed Due Process under the Fifth Amendment to the U.S. Constitution. *Reno v. Flores*, 507 U.S. 292, 306 (1993).

31. Immigration detention should not be used as a punishment and should only be used when, under an individualized determination, a noncitizen is a flight risk because they are unlikely to appear for immigration court or a danger to the community. *Zadvydas v. Davis*, 533 U.S. 678, 690 (2001).

32. On information and belief, Respondents did not afford Petitioner due process before revoking his release from detention, depriving him of his liberty interest, and unlawfully placing him in detention within Respondents' legal and physical custody. *See, e.g., Euceda Martinez v. LaRose, et al.*, No. 25-CV-3308 JLS (MSB), 2025 WL 3677938, at *4 (S.D. Cal. Dec. 18, 2025) (granting habeas to noncitizen paroled into the U.S. after arriving using CBP One because of the protected liberty interest at issue).

33. On information and belief, Respondents are using the immigration

detention system, including extra-territorial transfer and detention, as a means to punish individuals for asserting rights under the INA and U.S. Constitution.

CAUSES OF ACTION

COUNT ONE

Violation of Fifth Amendment Right to Due Process – Substantive Due Process, U.S. Const. Amend. V.

34. Petitioner restates, realleges, and incorporates by reference each and every allegation in the paragraphs above as if fully set forth herein.

35. The Due Process Clause of the Fifth Amendment to the U.S. Constitution prohibits the federal government from depriving any person of "life, liberty, or property, without due process of law." U.S. Const. Amend. V. Due process protects "all 'persons' within the United States, including [non-citizens], whether their presence here is lawful, unlawful, temporary, or permanent." *Zadvydas*, 533 U.S. at 693.

36. Due process requires that government action be rational and non-arbitrary. *See U.S. v. Trimble*, 487 F.3d 752, 757 (9th Cir. 2007).

37. While asylum is a discretionary benefit, the right to apply is not. 8 U.S.C. § 1158(a)(1). Any noncitizen who is "physically present in the United States or who arrives in the United States (whether or not at a designated port of arrival . . .), irrespective of such [noncitizen's] status, may apply for asylum." *Id.*

38. The INA, 8 U.S.C. §§ 1151-1154, provides visas that are unlimited

and immediately available for immediate relatives of United States citizens and, by statute, allocates thousands of visas for issuance per annum for other categories of noncitizens seeking to immigrate to the United States.

39. The "term 'immediate relatives' means the children, spouses, and parents of a citizen of the United States, except that, in the case of parents, such citizens shall be at least 21 years of age." 8 U.S.C. § 1151(b)(2)(A)(i).

40. Upon the filing or approval of an immigrant petition for an immediate family member, the beneficiary may seek adjustment of status through filing an application for adjustment of status. *See* 8 U.S.C. § 1255(a).

41. Through enactment of 8 U.S.C. § 1255 Congress provided a pathway to legal residency for certain classes of noncitizens. These pathways permit noncitizens not lawfully in the United States to "adjust" their status to legal permanent resident if they meet certain requirements. *Id.*

42. As an initial matter, for a noncitizen to apply for adjustment of status, he or she must have been "admitted or paroled into the United States." *Id.*

43. If so admitted or paroled, the Secretary may adjust the alien's status to that of a permanent resident "if (1) the alien makes an application for such adjustment, (2) the alien is eligible to receive an immigrant visa and is admissible to the United States for permanent residence, and (3) an immigrant visa is immediately available to him at the time his application is filed." *Id.*

44. Moreover, Petitioner has a vital liberty interest in remaining free from

Respondents' custody. *See Pinchi v. Noem*, No. 5:25-CV-05632-PCP, 2025 WL 2084921, at *4 (N.D. Cal. July 24, 2025) (citing *Diaz v. Kaiser*, No. 3:25-CV-05071, 2025 WL 1676854 (N.D. Cal. June 14, 2025) (explaining that a non-citizen that ICE released from custody after initial apprehension "has a substantial private interest in remaining out of custody" which includes an interest in "...obtaining necessary medical care, [and] maintaining her relationships in the community..."); *Garcia v. Andrews*, No. 1:25-CV-01006 JLT SAB, 2025 WL 2420068, at *7 (E.D. Cal. Aug. 21, 2025) (quoting *Pinchi v. Noem*, No. 5:25-CV-05632-PCP, 2025 WL 2084921, at *3 (N.D. Cal. July 24, 2025)); *see Noori v. LaRose*, No. 25-CV-1824-GPC-MSB, 2025 WL 2800149, at *10 (S.D. Cal. Oct. 1, 2025) ("In this case, Petitioner is not an "arriving" noncitizen but one that has present in our country for over a year. This substantial amount of time indicates he is afforded the Fifth Amendment's guaranteed due process before removal.").

45. While on release from DHS custody, Petitioner contributed to the U.S. and built a life with his U.S. citizen spouse. **Exhibit A-4**, Letter of Support by M.C.S., at 1-2 (describing Petitioner's three years of marriage to a U.S. citizen, Petitioner's community ties, and Petitioner's brain surgery recovery).

46. On information and belief, Respondents' agents detained Petitioner at an airport within the U.S., depriving him of his liberty interest and the bundle of rights associated with his pending application for adjustment of status through his U.S. citizen wife in violation of due process, and putting him into detained removal

proceedings. *See Mathews v. Eldridge*, 424 U.S. 319, 333 (1976) (requiring notice and an opportunity to be heard before deprivation of a legally protected interest). Nor has the government identified any materially changed circumstances that would warrant detaining Petitioner.

COUNT TWO

Violation of Fifth Amendment Right to Due Process – Procedural Due Process, U.S. Const. Amend. V.

47. Petitioner restates, realleges, and incorporates by reference each and every allegation in the paragraphs above as if fully set forth herein.

48. The government may not deprive a person of life, liberty, or property without due process of law. U.S. Const. Amend. V. "Freedom from imprisonment—from government custody, detention, or other forms of physical restraint—lies at the heart of the liberty that the Clause protects." *Zadvydas v. Davis*, 533 U.S. 678, 690 (2001).

49. Petitioner has a fundamental interest in liberty and being free from official restraint.

50. The government's detention of Petitioner without notice or an opportunity to be heard before detention violates his right to due process.

51. The government's detention of Petitioner without a meaningful bond and custody redetermination hearing to determine whether he is a flight risk or danger to others violates his right to due process.

COUNT THREE

Violation of the Administrative Procedure Act – 5 U.S.C. § 706(2)(A) Not in Accordance with Law and in Excess of Statutory Authority Violation of 8 C.F.R. § 239.2(c)

52. Petitioner restates, realleges, and incorporates by reference each and every allegation in the paragraphs above as if fully set forth herein.

53. Under the APA, a court "shall . . . hold unlawful . . . agency action" that is "not in accordance with law;" "contrary to constitutional right;" "in excess of statutory jurisdiction authority, or limitations;" or "without observance of procedure required by law." 5 U.S.C. § 706(2)(A)-(D).

54. It is a well-established administrative principle that "agency action taken without lawful authority is at least voidable, if not void ab initio." *L.M.-M. v. Cuccinelli*, 442 F. Supp. 3d 1, 35 (D.D.C. 2020), citing *SW General, Inc. v. NLRB*, 796 F.3d 67, 79 (D.C. Cir. 2015); *see also Hooks v. Kitsap Tenant Support Servs., Inc.*, 816 F.3d 550, 555 (9th Cir. 2016) (invalidating agency action because it was taken by unauthorized official).

55. Under the APA, an agency must provide "reasoned explanation for its action" and "may not depart from a prior policy sub silentio or simply disregard rules that are still on the books." *FCC v. Fox Television Stations, Inc.*, 556 U.S. 502, 515 (2009). His detention without notice or an opportunity to be heard unlawfully deprives him of his liberty interest. *See Pinchi v. Noem*, No. 5:25-CV-05632-PCP, 2025 WL 2084921, at *5 (N.D. Cal. July 24, 2025) ("Detention for its

own sake, to meet an administrative quota, or because the government has not yet established constitutionally required pre-detention procedures is not a legitimate government interest."); **Exhibit A-4**, Letter of Support by M.C.S., at 1-2 (describing Petitioner's life with his U.S. citizen wife and community ties).

56. In deciding to detain Petitioner at the airport without notice, Respondents violated the APA by "entirely fail[ing] to consider an important aspect of the problem" – namely, the important procedural rights that Petitioner relied on in § 1229a immigration court proceedings. *See Motor Vehicle Mfrs. Ass'n of U.S., Inc. v. State Farm Mut. Auto. Ins. Co.*, 463 U.S. 29, 43 (1983); *see also Dep't of Homeland Sec. v. Regents of the Univ. of California*, 591 U.S. 1, 24-33 (2020) (holding that rescission of immigration policy without considering "particular reliance interests" is arbitrary and capricious in violation of the APA).

57. The arbitrary and capricious arrest of Petitioner was not made in furtherance of an enumerated reason set forth in the regulations and causes Petitioner and his family harm. *See* **Exhibit A-4**, Letter of Support of M.C.S., at 2. For these reasons, the Court should find that the decision to detain Petitioner is arbitrary, capricious, and unsupported by substantial evidence. *See* 5 U.S.C. § 706(2)(A), (E).

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COUNT FOUR

Violation of the Administrative Procedure Act – 5 U.S.C. § 706(2)(A) Not in Accordance with Law and in Excess of Statutory Authority, Unlawful Detention

58. Petitioner restates, realleges, and incorporates by reference each and every allegation in the paragraphs above as if fully set forth herein.

59. Under the APA, a court shall "hold unlawful and set aside agency action..." that is "...(A) arbitrary, capricious, an abuse of discretion, or otherwise not in accordance with law; (B) contrary to constitutional right, power, privilege, or immunity..." 5 U.S.C. § 706(2)(A)-(B).

60. An action is an abuse of discretion if the agency "entirely failed to consider an important aspect of the problem, offered an explanation for its decision that runs counter to the evidence before the agency, or is so implausible that it could not be ascribed to a difference in view or the product of agency expertise." *Nat'l Ass'n of Home Builders v. Defs. of Wildlife*, 551 U.S. 644, 658 (2007) (quoting *Motor Vehicle Mfrs. Ass'n of U.S., Inc. v. State Farm Mut. Auto. Ins. Co.*, 463 U.S. 29, 43 (1983)).

61. To survive an APA challenge, the agency must articulate "a satisfactory explanation" for its action, "including a rational connection between the facts found and the choice made." *Dep't of Com. v. New York*, 588 U.S. 752, 773 (2019) (citation omitted).

62. The INA provides that Respondents may release an individual from

apprehension or custody based on an individualized determination of their danger and flight risk. *See* 8 U.S.C. § 1226(a); *Zadvydas*, 533 U.S. at 690; *Matter of Guerra*, 24 I&N Dec. 37 (BIA 2006). After such a release decision is made, a revocation of the custody determination may be made only when warranted by an individual's specific facts and circumstances. 8 U.S.C. § 1226(b); 8 C.F.R. § 1236.1(c)(9).

63. Further, under the APA, non-citizens are entitled to determinations related to their release revocations that are not arbitrary, capricious or an abuse of discretion. *See id.* at *10.

64. By detaining Petitioner without notice or consideration of his individualized facts and circumstances, Respondents have violated the INA, implementing regulations, and the APA.

65. Respondents have made no finding that Petitioner is a danger to the community.

66. Respondents have made no finding that Petitioner is a flight risk.

67. Respondents have already considered Petitioner's facts and circumstances and determined that he was not a flight risk or danger to the community when he entered the U.S. On information and belief, there have been no changes to the facts of Petitioner's proceedings that justify detention. The fact that Petitioner previously may have received a visa to enter the U.S. demonstrates that, on an individualized basis, he was determined not to be a danger to the community

or a flight risk.

PRAYER FOR RELIEF

WHEREFORE, Petitioner respectfully requests this Court to grant the following:

a. Assume jurisdiction over this matter;

b. Order that Petitioner shall not be transferred outside of the Southern District of California while this Petition is pending;

c. Issue an Order to Show Cause ordering Respondents to show cause within three days why this Petition should not be granted;

d. Issue a Writ of Habeas Corpus ordering Respondents to immediately release Petitioner from custody;

e. Declare that Petitioner's detention is unlawful and in violation of the INA and Due Process;

f. Enjoin Respondents from re-detaining Petitioner unless his re-detention is ordered at a constitutionally adequate custody hearing before this Court in which the government bears the burden of proving, by clear and convincing evidence, that Petitioner is a flight risk or danger to the community;

g. Award Petitioner attorney's fees and costs under the Equal Access to Justice Act ("EAJA"), as amended, 28 U.S.C. § 2412, and on any other basis justified under law; and

h. Grant any other and further relief that this Court deems just and proper.[1]

Dated: July 28, 2026

Respectfully Submitted,

/s/ Mihret Getabicha

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Attorney for Petitioner Abderrahim Assemahli

[1] On information and belief, the immigration court system is not an impartial, independent adjudicative body. *See, e.g., Palomera Baltazar v. James Janecka, et al.*, No. 5:26-cv-00019-SSS-BFM, Order Granting Petitioner's Ex Parte Application for Temporary Restraining Order, at *3 (C.D. Cal. Jan. 16, 2026) ("At this point in time, the Court can no longer confer Respondents with the benefit of the doubt as to the intent of their filings. Despite the final judgment in Bautista, it appears that immigration judges continue to rely on legal interpretations that were expressly found unlawful."); *Perez Velasquez v. Bondi, et al.*, No. 26-CV-01759-GPC-DDL, 2026 WL 1042479, at *4 and *7 (S.D. Cal. Apr. 16, 2026) (ordering petitioner's release after a "legally and constitutionally inadequate" bond hearing where the immigration judge failed to consider all the relevant evidence, resulting in irreparable harm); Nicholas Nehamas, Allison McCann, Steven Rich, Jazmine Ulloa, and Hamed Aleaziz, *How Trump Purged Immigration Judges to Speed Up Deportations*, THE NEW YORK TIMES (Apr. 13, 2026), https://www.nytimes.com/2026/04/09/us/politics/trump-miller-immigration-judges-purge.html?unlocked_article_code=1.ZlA.JJNG.txwMTdEzjRn7&smid=url-share (last visited May 5, 2026) ("One current judge said the 'pressure to deny bond is overt.'"). In light of these facts, a bond hearing would be inadequate to remedy the harm to Petitioner. *See* **Exhibit A-4**, at 1-2.

VERIFICATION PURSUANT TO 28 U.S.C. § 2242

I, Mihret Getabicha, represent Petitioner, Abderrahim Assemahli, and submit this verification on his behalf. I hereby verify that the factual statements made in the foregoing Petition for Writ of Habeas Corpus are true and correct to the best of my knowledge and belief.

Executed on July 28, 2026, in Sacramento, California.

/s/ Mihret Getabicha

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